

From: Sarah A. Zylstra
Sent: Thursday, March 31, 2022 7:39 PM
To: Covaleski, Paul
Cc: Ingrisano, Jonathan
Subject: RE: Edgewood v. City of Madison et al. - Response to Meet and Confer [GK-Active.FID3018047]

This works.



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From: Covaleski, Paul <PCovaleski@gklaw.com>
Sent: Thursday, March 31, 2022 5:13 PM
To: Sarah A. Zylstra <szylstra@boardmanclark.com>
Cc: Ingrisano, Jonathan <jingrisa@gklaw.com>
Subject: RE: Edgewood v. City of Madison et al. - Response to Meet and Confer [GK-Active.FID3018047]

Sarah,

We would be fine with that, so long as any supplemental proposed findings of fact based on his deposition were filed by May 20 – which is the date we are asking for with the extension, anyways.

Is that agreeable to you?

Just so we are on the same page: first we will jointly ask for a one week extension of all MSJ deadlines, and if that is denied we will stipulate to you filing supplemental proposed findings of fact (including new facts but limited to facts raised in Mike's deposition) by May 20? And Mike's dep would be scheduled for May 10.

If so, I can put something together and circulate tomorrow.

Thanks,

Paul Covaleski | Attorney
608.284.2619 direct | PCovaleski@gklaw.com

GODFREY & KAHN, S.C.

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From: Sarah A. Zylstra <szylstra@boardmanclark.com>

Sent: Thursday, March 31, 2022 3:36 PM

To: Covaleski, Paul <PCovaleski@gklaw.com>

Cc: Ingrisano, Jonathan <jingrisa@gklaw.com>

Subject: RE: Edgewood v. City of Madison et al. - Response to Meet and Confer [GK-Active.FID3018047]

[EXTERNAL] This message originated from outside your domain.

It does not give me enough time to work in any facts from his deposition into any proposed findings of fact or the briefing. Your suggestion is that I can just fill in cites and that I need to get everything in except for the cites. Instead, will you agree that I can file supplemental proposed findings of facts (i.e., new facts) based on his deposition after the SJ deadline?



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From: Covaleski, Paul <PCovaleski@gklaw.com>

Sent: Thursday, March 31, 2022 2:37 PM

To: Sarah A. Zylstra <szylstra@boardmanclark.com>

Cc: Ingrisano, Jonathan <jingrisa@gklaw.com>

Subject: RE: Edgewood v. City of Madison et al. - Response to Meet and Confer [GK-Active.FID3018047]

Sarah,

Jonathan is travelling out of state that week and completely out of pocket, which is why we offered the 10th as the best we can do. In the event the Court denies our requested extension, we could also stipulate now (or, more accurately, as soon as the denial comes in) to the below so that you have the Court's blessing before the deadline to file a corrected brief after. The Court is not going to review anything until all rounds of briefing are completed, anyways.

Let us know your thoughts.

Thanks,

Paul Covaleski | Attorney
608.284.2619 direct | PCovaleski@gklaw.com



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From: Sarah A. Zylstra <szylstra@boardmanclark.com>

Sent: Thursday, March 31, 2022 2:23 PM

To: Covaleski, Paul <PCovaleski@gklaw.com>

Cc: Ingrisano, Jonathan <jingrisa@gklaw.com>

Subject: RE: Edgewood v. City of Madison et al. - Response to Meet and Confer [GK-Active.FID3018047]

[EXTERNAL] This message originated from outside your domain.

I don't think that really works. Can you produce him the first week in May if the court doesn't grant the bump?



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From: Covaleski, Paul <PCovaleski@gklaw.com>

Sent: Thursday, March 31, 2022 2:02 PM

To: Sarah A. Zylstra <szylstra@boardmanclark.com>

Cc: Ingrisano, Jonathan <jingrisa@gklaw.com>

Subject: RE: Edgewood v. City of Madison et al. - Response to Meet and Confer [GK-Active.FID3018047]

Sarah,

I don't think we can ensure producing Mike for his deposition the last week in April in the event the Court does not grant our joint motion for extension.

We can, however, stipulate to you being able to fill in any citations to Mike's deposition in your brief or proposed findings of fact after the transcript comes back on an expedited basis, including after the May 13th deadline if necessary – does that work?

Thanks,

Paul Covaleski | Attorney

608.284.2619 direct | PCovaleski@gklaw.com



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From: Sarah A. Zylstra <szylstra@boardmanclark.com>

Sent: Thursday, March 31, 2022 9:01 AM

To: Covaleski, Paul <PCovaleski@gklaw.com>

Subject: RE: Edgewood v. City of Madison et al. - Response to Meet and Confer [GK-Active.FID3018047]

[EXTERNAL] This message originated from outside your domain.

Ok, why don't you give me a call around 9:30ish when you are back.



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From: Covaleski, Paul <PCovaleski@gklaw.com>

Sent: Thursday, March 31, 2022 8:58 AM

To: Sarah A. Zylstra <szylstra@boardmanclark.com>

Subject: Re: Edgewood v. City of Madison et al. - Response to Meet and Confer [GK-Active.FID3018047]

I'm at an appointment right now but will be back around 930 and am free the rest of the day.

Sent from my iPhone

On Mar 31, 2022, at 8:55 AM, Sarah A. Zylstra <szylstra@boardmanclark.com> wrote:

[EXTERNAL] This message originated from outside your domain.

I am free currently. Are you free now?



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From: Covaleski, Paul <PCovaleski@gklaw.com>

Sent: Thursday, March 31, 2022 8:50 AM

To: Sarah A. Zylstra <szylstra@boardmanclark.com>

Subject: RE: Edgewood v. City of Madison et al. - Response to Meet and Confer [GK-Active.FID3018047]

Hi Sarah – do you have 5-10 minutes later this morning or this afternoon to chat regarding our discussion yesterday? If so, when is a good time?

Thanks,

Paul Covaleski | Attorney
608.284.2619 direct | PCovaleski@gklaw.com



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